

Subject: Comments on Orca Critical Habitat
From: "Bo Bricklemyer" <bobrick@igc.org>
Date: Mon, 14 Aug 2006 09:31:52 -0700
To: orcahabitat.nwr@noaa.gov

Dear NOAA:

Almost 30 years ago, when I was working for the Marine Mammal Commission in Washington, DC, I was concerned about the effects of human disturbance on the socialization and reproductive success of Orcas in the Northwest. Just one month ago I had reason to again worry that this disturbance, in the form of whale watching, could be having important negative repercussions.

I had occasion to have to go to the San Juans on business from my Port Townsend office and found that the quickest way was by whale watching boat. Thus I got to witness how whales were being watched -- in this case in US waters by 16 boats, about evenly divided with 8 running parallel to the group of Orcas on one side and 8 on the other. Basically for the almost one hour before we left, the whales had constant boat traffic and noise on each side. Except for one boat, the Annie Mae out of the San Juans which consistently approached too closely and harassed the whale for its few passengers, the other 15 boats complied with the required separation as currently set out in the regs. But that is exactly the problem: the current 100 yard distance does nothing to prevent constant disruption of the state of the wild and contribution of petroleum and noise pollution directly "in the face of" these creatures. And this occurs from late April into October -- a gauntlet of disruption that has to be endured during most daylight hours of most days.

I suppose that by showing people one of the visible marvels of the mostly invisible ocean environment, there is some benefit derived. But I firmly believe that this potential benefit has become outweighed by the explosive growth in the whale watch business.

Therefore I suggest that if we are serious about creating protected habitat to encourage and enable the recovery of this icon of the Pacific Northwest; and if it cannot be shown conclusively that such pollution and disturbance have no impact on this recovery goal; then we must ban whale watching in such areas as are designated as critical.

Thank you for considering my comments on this important matter.

Sincerely,

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ARC Group is a federally recognized, 501(c)(3) non-profit conservation firm, registered in the State of Washington. For 25 years it has worked to promote processes that foster better management of our planet's water.